



Air Quality Permitting Statement of Basis

July 26, 2006

Tier I Operating Permit No. T1-040049

**Fiberglass Systems, Inc
Boise, Idaho**

Facility ID No. 001-00101

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PUBLIC COMMENT

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
Bbl	barrel
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed the information provided by Fiberglass Systems, Inc. regarding the operation of its facility located in Boise, Idaho. This information was submitted based on the requirements to submit a Tier I operating permit application in accordance with IDAPA 58.01.01.313.03.

2. FACILITY DESCRIPTION

This facility is a fiberglass tub and shower manufacturer.

3. FACILITY/AREA CLASSIFICATION

This facility is a major facility as defined by IDAPA 58.01.01.008.10, because it emits or has the potential to emit a regulated air pollutant(s) in amounts greater than or equal to major facility threshold(s) listed in Subsection 008.10.

The Standard Industrial Classification (SIC) defining the facility is 3079, and the Aerometric Information Retrieval System (AIRS) facility classification is A.

The facility is located in Ada County which is designated as attainment for PM₁₀ and CO, and unclassifiable for all other criteria pollutants. There is not a Class I area(s) within 10 kilometers (km) of the facility. This facility is located in Air Quality Control Region (AQCR) 64 and Universal Transverse Mercator (UTM) Zone 11.

4. APPLICATION SCOPE

This permitting action involves the renewal of the facility's existing Tier I operating permit and incorporates 40 CFR 63, Subpart WWWW.

5. SUMMARY OF EVENTS

December 22, 2004	DEQ receives application
February 20, 2005	DEQ determines application complete

5.1 Permitting History

PTC No. 001-00101, issued October 5, 1994

PTC No. 001-00101, issued May 2, 1995

PTC No. 001-00101, issued February 14, 2000

PTC No. 001-00101, issued December 28, 2000

Tier I Operating Permit No. 001-00101, issued May 23, 2001

Administrative Amendment of Tier I Operating Permit No. 001-00101, issued June 13, 2001

Tier I Operating Permit application received December 22, 2004

6. PERMIT ANALYSIS

6.1 Basis of Analysis

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- PTC No. 001-00101, issued October 5, 1994
- PTC No. 001-00101, issued May 2, 1995
- PTC No. 001-00101, issued February 14, 2000
- PTC No. 001-00101, issued December 28, 2000
- Tier I Operating Permit No. 001-00101, issued May 23, 2001
- Administrative Amendment of Tier I Operating Permit No. 001-00101, issued June 13, 2001
- Tier I Operating Permit application received December 22, 2004
- Guidance developed by the U.S. Environmental Protection Agency (EPA) and DEQ

6.2 Emissions Description and Emissions Inventory

An emission inventory was not submitted as part of this renewal.

7. REGULATORY ANALYSIS

7.1 IDAPA 58.01.01.369 – Tier I Operating Permit Renewal

This permitting action is an operating permit renewal because of the pending expiration of the permit. Tier I operating permit renewals are subject to the requirements of IDAPA 58.01.01.369.

7.2 New Source Performance Standards (NSPS) – 40 CFR 60

No applicable NSPS provisions apply.

7.3 National Emission Standards for Hazardous Air Pollutants (NESHAPS) – 40 CFR Parts 61 & 63

40 CFR 63, Subpart WWWW National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production

This subpart establishes national emissions standards for hazardous air pollutants (NESHAP) for reinforced plastic composites production. This subpart also establishes compliance options, operating requirements, and work practice requirements to demonstrate initial and continuous compliance with the hazardous air pollutants (HAP) emissions standards for open molding, polymer casting, mixing, and cleaning of equipment procedures used in reinforced plastic composites manufacture. The requirements of this subpart apply to this facility because the facility-wide HAP emissions of the facility exceed major source thresholds.

8. PERMIT ANALYSIS

This section describes only the changes made to the permit as a result of this permitting action. Existing permit conditions are identified as “Existing Permit Conditions”, and revised permit conditions are identified as “Revised Permit Conditions.”

Emissions Unit – Area Source

8.1 Emission Unit Description – Area Source

The stacks at the facility are treated as an area source, because they all vent the plant floor. VOCs are emitted from various stages of production in different areas of the plant floor, so it is not possible to associate specific emissions with individual stacks.

8.2 Permit Conditions Review

Table 1 provides a list of the revised numbering for the permit conditions of this permit.

Existing Permit Condition	Revised Permit Condition
2.1-2.3	3.3-3.5
2.4	3.8
2.5-2.9	3.21-3.25
2.10	3.56
2.11	3.10
2.12	3.27
2.13	3.13
2.14	3.9
2.15	3.12
2.16	3.14
2.17	3.26
2.18	3.11
2.19	3.6

Compliance with the VOC emission limit in Permit Condition 3.3 shall be demonstrated through the operating, monitoring, and record keeping requirements of Permit Conditions 3.21, 3.24, 3.25, and 3.56.

Compliance with the Styrene, Methylene Chloride, Methyl Ethyl Ketone Peroxide emission limit in Permit Condition 3.4 shall be demonstrated through the operating, monitoring, and record keeping requirements of Permit Conditions 3.21, 3.22, 3.23, and 3.56.

Compliance with the visible emission limit in Permit Condition 3.5 shall be demonstrated through the operating, monitoring, and record keeping requirements of Permit Conditions 2.8, 3.8, and 3.10.

Compliance with the particulate emission limit in Permit Condition 3.7 shall be demonstrated through the operating, and monitoring requirements of Permit Conditions 3.9 and 3.27, respectively.

Compliance with the fugitive dust requirements in Permit Condition 3.13 shall be demonstrated through the operating requirements of Permit Conditions 3.9 and 3.12.

Compliance with the fugitive VOC requirements in Permit Condition 3.14 shall be demonstrated through the operating and monitoring requirements of Permit Conditions 3.11 and 3.26.

New Permit Conditions 3.15-20, 3.28-3.55 and 3.57-3.60 contain the operating, monitoring, and record keeping requirements, respectively, established by 40 CFR 63, Subpart WWWW. These requirements shall be used to demonstrate compliance with HAP emission limits in new Permit Condition 3.7.

8.3 Nonapplicable Emissions Units

The facility did not provide a list of emissions units not subject to an applicable requirement other than generally applicable requirements (e.g. opacity).

9. INSIGNIFICANT ACTIVITIES

Insignificant Activities	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
Welding not using more than one (1) ton per day of welding rod	9
Storage and handling of water based lubricants for metal working where the organic content of the lubricant is less than ten percent (10%)	27
Combustion sources, less than five million (5,000,000) Btu/hr, exclusively using natural gas	5

10. ALTERNATIVE OPERATING SCENARIOS

The facility did not request any alternative operating scenarios.

11. TRADING SCENARIOS

The facility did not request any trading scenarios.

12. COMPLIANCE SCHEDULE

12.1 Compliance Plan

The facility has not provided a compliance plan.

12.2 Compliance Certification

The facility is required to periodically certify compliance in accordance with General Provision 21. The facility shall submit an annual compliance certification for each emissions unit to DEQ and EPA in accordance with IDAPA 58.01.01.314.10. The compliance certification report shall address the compliance status of each emissions unit with the terms and conditions of this permit.

13. PERMIT REVIEW

13.1 Regional Office Review of Draft Permit

DEQ provided the draft permit to its Boise Regional Office on May 5, 2006.

13.2 Facility Review

DEQ provided a draft permit to the facility on June 9, 2006. No comments were received.

13.3 Public Comment

A public comment period and public notice on the Tier I operating permit shall be provided in accordance with IDAPA 58.01.01.364.

14. ACID RAIN PERMIT

This facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain permit requirements do not apply.

15. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is in compliance with registration and registration fee requirements.

16. RECOMMENDATION

Based on the Tier I operating permit application and review of state rules and federal regulation, staff recommend that DEQ issue draft Tier I Operating Permit No. T1-040049 for public comment to Fiberglass Systems for its Boise facility. This permit administratively renews the facility's existing Tier I operating permit. The project does not involve PSD permitting requirements.

ABC/bf Permit No. T1-040049

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Appendix A

**Fiberglass Systems, Inc
Boise, Idaho**

Tier I Operating Permit No. T1-040049

Facility ID No. 001-00101

AIRS Data Entry Form

AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
POLLUTANT							
SO ₂	B						U
NO _x	B						U
CO	B						U
PM ₁₀	B						U
PT (Particulate)	B						U
VOC	A					A	U
THAP (Total HAPs)	A				A	A	U
APPLICABLE SUBPART							
WWW							

- ^A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class “A” is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- ^B = Actual and potential emissions below all applicable major source thresholds.
- ^C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).
- ^{NA} = Not applicable as defined in IDAPA 58.01.01.579, constructed prior to baseline dates.